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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Plaintiff,

v.

THE CITY OF PORTLAND,

Defendant.

Case No. 3:12-cv-02265-SI

JOINT STATUS REPORT FOLLOWING
MEDIATION PURSUANT TO PARAGRAPH
182

Plaintiff United States of America (United States) and Defendant City of Portland (City) jointly submit this status report following mediation to resolve the United States' notice of the City's noncompliance with the Amended Settlement Agreement (Agreement), previously entered in this matter (ECF No. 262). The mediation was conducted pursuant to Paragraph 182 of the Agreement.

Between September and December 2021, United States Magistrate Judge Stacie Beckerman facilitated mediation between the United States and the City, along with the Intervenor-Defendant Portland Police Association (PPA), Enhanced Amicus Curiae the Albina Ministerial Alliance Coalition for Justice and Police Reform (AMAC), and Amicus Curiae the Mental Health Alliance (MHA). *See* ECF Nos. 256, 263, 266, 267, 268, 272.

The United States and the City hereby advise the Court of the mediation's proposed outcome, consisting of proposed amendments to add new Section XI – Addendum of Additional Remedies to the Agreement. The proposed Section XI contains eight paragraphs, numbered 188 to 195, which identify actions the City will take to resolve compliance concerns raised by the United States.¹ The PPA has advised that it will not object to the proposed amendments.

The City anticipates the City Council will schedule a public hearing on the proposed amendments for January 26, 2022. If the City Council thereafter approves the proposed amendments, as required by Paragraph 184 of the Agreement, the Parties promptly will file a joint motion to amend the Agreement. The AMAC and the MHA have advised that they do not object to the Parties having no further mediation sessions and the Court scheduling a fairness hearing to consider the proposed amendments. We anticipate asking the Court to schedule that fairness hearing at the Court's earliest convenience. If approved by the Parties and adopted by the Court, this proposed Section XI would resolve the United States' pending notice of the City's noncompliance with the Agreement.

¹ The proposed Section XI is attached as Exhibit 1.

DATED: January 10, 2022.

Respectfully submitted,

FOR THE UNITED STATES:

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